

# Record of Processing Activities (ROPA)

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This document provides a processor-oriented Article 30 processing record.

## 1. Controller/Processor Details

Processor: [Your Legal Entity Name] Processor contact: [privacy@your-domain] DPO/contact point: [dpo@your-domain]

Controllers: Contracted schools/trusts using the service.

## 2. Processing Inventory

Processing Activity	Purpose	Data Subjects	Data Categories	Recipients	International Transfers	Retention
Account management	Provision user access	Students, staff	Identity, account metadata	Internal support/admin roles	As per subprocessor register	As per retention policy
Learning activity logging	Provide learning progress	Students	Learning attempts, timestamps, class metadata	Teacher/admin users in same tenant	As per subprocessor register	As per retention policy
Security logging	Detect and investigate misuse	Students, staff	Auth events, audit events, limited technical metadata	Security/operations personnel	As per subprocessor register	As per retention policy
Optional TTS processing	Audio generation for words/sentences	Students	Prompt text for synthesis	TTS provider (if enabled)	As per subprocessor register	Minimal operational retention

## 3. Security Measures Reference

Detailed controls are set out in:

- 06-Technical-and-Organisational-Measures-TOMs.md

## 4. Review Cycle

ROPA is reviewed at least annually and after major processing changes.